

EXHIBIT "A"

1 KENNER LAW FIRM, P.C.
David E. Kenner, SBN 41425
2 Brett A. Greenfield, SBN 217343
16000 Ventura Boulevard, PH 1208
3 Encino, CA 91364
818 995 1195
4 818 475 5369 - fax

5 WADE, KELLY & SULLIVAN
733 W. 4th Avenue, Suite 200
6 Anchorage, Alaska 99501
(907) 561-7743
7 (907) 562-8977 - fax

8 Attorney for Defendant Josef F. Boehm

9 IN THE UNITED STATES DISTRICT COURT
10 DISTRICT OF ALASKA

11
12 Sally C. Purser,)
13 Plaintiff,) AFFIDAVIT OF JOSEF BOEHM
14 v.)
15 Josef F. Boehm, Allen K.)
Bolling, and Bambi Tyree,)
16 Defendants.)
17 CASE NO.: A05-0085 (JKS)
18)
19)

20 DECLARATION OF JOSEF BOEHM

21 I Josef Boehm, say and declare as follows:

- 22 1. As to each of the allegations set forth in the Affidavits of
23 Salley Purser and Bambi Tyree, I declare as follows:
24 2. I deny the allegation set forth in the affidavit of Salley
25 Purser, paragraph 3;
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- 1 3. I do not have sufficient facts in order to admit or deny the
2 allegation set forth in the affidavit of Salley Purser,
3 paragraph 3;
- 4 4. I deny the allegations set forth in the affidavit of Salley
5 Purser, paragraph 4;
- 6 5. I deny the allegation set forth in the affidavit of Salley
7 Purser, paragraph 5;
- 8 6. I deny the allegations set forth in the affidavit of Salley
9 Purser, paragraph 6;
- 10 7. I deny the allegations set forth in the affidavit of Salley
11 Purser, paragraph 7;
- 12 8. I deny the allegations set forth in the affidavit of Salley
13 Purser, paragraph 8;
- 14 9. I deny the allegation set forth in the affidavit of Salley
15 Purser, paragraph 9, subsections (a), (b), (c), (d), (e);
- 16 10. I deny the allegations set forth in the affidavit of Salley
17 Purser, paragraph 10;
- 18 11. I deny the allegations set forth in the affidavit of Salley
19 Purser, paragraph 11;
- 20 12. I deny the allegations set forth in the affidavit of Salley
21 Purser, paragraph 12;
- 22 13. I deny the allegations set forth in the affidavit of Salley
23 Purser, paragraph 13;
- 24 14. I deny the allegations set forth in the affidavit of Salley
25 Purser, paragraph 14;
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- 1 15. I deny the allegations set forth in the affidavit of Salley
2 Purser, paragraph 15;
- 3 16. I deny the allegations set forth in the affidavit of Salley
4 Purser, paragraph 16;
- 5 17. I deny the allegations set forth in the affidavit of Salley
6 Purser, paragraph 17;
- 7 18. I deny the allegations set forth in the affidavit of Salley
8 Purser, paragraph 18;
- 9 19. I deny the allegations set forth in the affidavit of Salley
10 Purser, paragraph 19;
- 11 20. I deny the allegations set forth in the affidavit of Salley
12 Purser, paragraph 20;
- 13 21. I deny the allegations set forth in the affidavit of Salley
14 Purser, paragraph 21;
- 15 22. I deny the allegations set forth in the affidavit of Salley
16 Purser, paragraph 22;
- 17 23. I deny the allegations set forth in the affidavit of Salley
18 Purser, paragraph 23. I do not have sufficient facts in which to
19 admit or deny whether Salley Purser had intercourse with Leslie
20 Williams while in Seattle.
- 21 24. I deny the allegations set forth in the affidavit of Salley
22 Purser, paragraph 24;
- 23 25. I deny the allegations set forth in the affidavit of Salley
24 Purser, paragraph 25;
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- 1 26. I deny the allegations set forth in the affidavit of Salley
2 Purser, paragraph 26;
- 3 27. I deny the allegations set forth in the affidavit of Salley
4 Purser, paragraph 27;
- 5 28. I do not have sufficient facts in which to admit or deny the
6 allegations set forth in the affidavit of Salley Purser,
7 paragraph 28;
- 8 29. I deny the allegations set forth in the affidavit of Salley
9 Purser, paragraph 29;
- 10 30. I deny the allegations set forth in the affidavit of Salley
11 Purser, paragraph 30 as they pertain to me;
- 12 31. I deny the allegations set forth in the affidavit of Salley
13 Purser, paragraph 31;
- 14 32. I deny the allegations set forth in the affidavit of Salley
15 Purser, paragraph 32;
- 16 33. I deny the allegations set forth in the affidavit of Salley
17 Purser, paragraph 33;
- 18 34. I deny the allegations set forth in the affidavit of Salley
19 Purser, paragraph 34;
- 20 35. I deny the allegations set forth in the affidavit of Bambi
21 Tyree, paragraph 6;
- 22 36. I deny the allegations set forth in the affidavit of Bambi
23 Tyree, paragraph 7;
- 24 37. I deny the allegations set forth in the affidavit of Bambi
25 Tyree, paragraph 8;
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- 1 38. I deny the allegations set forth in the affidavit of Bambi
2 Tyree, paragraph 9;
- 3 39. I deny the allegations set forth in the affidavit of Bambi
4 Tyree, paragraph 10;
- 5 40. I deny the allegations set forth in the affidavit of Bambi
6 Tyree, paragraph 11;
- 7 41. I deny the allegations set forth in the affidavit of Bambi
8 Tyree, paragraph 12;
- 9 42. I deny the allegations set forth in the affidavit of Bambi
10 Tyree, paragraph 13;
- 11 43. I deny the allegations set forth in the affidavit of Bambi
12 Tyree, paragraph 14;
- 13 44. I deny the allegations set forth in the affidavit of Bambi
14 Tyree, paragraph 15;
- 15 45. I deny the allegations set forth in the affidavit of Bambi
16 Tyree, paragraph 16;
- 17 46. I deny the allegations set forth in the affidavit of Bambi
18 Tyree, paragraph 17;
- 19 47. I deny the allegations set forth in the affidavit of Bambi
20 Tyree, paragraph 18;
- 21 46. I deny the allegations set forth in the affidavit of Bambi
22 Tyree, paragraph 19;
- 23 47. I deny the allegations set forth in the affidavit of Bambi
24 Tyree, paragraph 20;
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- 1 48. I deny the allegations set forth in the affidavit of Bambi
2 Tyree, paragraph 21;
- 3 49. I deny the allegations set forth in the affidavit of Bambi
4 Tyree, paragraph 22;
- 5 50. I deny the allegations set forth in the affidavit of Bambi
6 Tyree, paragraph 23;
- 7 51. I deny the allegations set forth in the affidavit of Bambi
8 Tyree, paragraph 24;
- 9 52. I deny the allegations set forth in the affidavit of Bambi
10 Tyree, paragraph 25;
- 11 53. I deny the allegations set forth in the affidavit of Bambi
12 Tyree, paragraph 26;
- 13 54. I deny the allegations set forth in the affidavit of Bambi
14 Tyree, paragraph 27;
- 15 55. I deny the allegations set forth in the affidavit of Bambi
16 Tyree, paragraph 28;
- 17 56. I deny the allegations set forth in the affidavit of Bambi
18 Tyree, paragraph 29;
- 19 57. I deny the allegations set forth in the affidavit of Bambi
20 Tyree, paragraph 30;
- 21 58. I deny the allegations set forth in the affidavit of Bambi
22 Tyree, paragraph 31;
- 23 59. I deny the allegations set forth in the affidavit of Bambi
24 Tyree, paragraph 32;
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1 60. I deny the allegations set forth in the affidavit of Bambi
2 Tyree, paragraph 33;

3 61. I deny the allegations set forth in the affidavit of Bambi
4 Tyree, paragraph 34;

5 62. I deny the allegations set forth in the affidavit of Bambi
6 Tyree, paragraph 35;

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8 63. I have given this declaration of my own free will without any
9 promise of reward or threat of coercion. I declare under penalty
10 of perjury under the laws of the State of California that this
11 declaration is the truth and I will testify consistent with if
12 called to do so in a court of law. I have had the opportunity to
13 read and revise this declaration prior to signing it.
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15 Executed this 15TH day of January, 2007 at Victorville,
16 California.

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19 JOSEF BOEHM
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